SERCARZ & RIOPELLE, LLP

810 SEVENTH AVENUE, SUITE 620

NEW YORK, NEW YORK 10019

1-212-586-4900

FACSIMILE 1-212-586-1234

www.sercarzandriopelle.com

ROLAND G. RIOPELLE MAURICE H. SERCARZ* ROBERT CALIENDO CIULIANA E. GRAHAM

*ADMITTED IN NY & NI

April 2, 2015

BY ECF

Hon. Laura Taylor Swain United States District Judge Southern District of New York 500 Pearl Street, Rm. 755 New York, NY 10007

> Re: <u>United States v. Annette Bongiorno, et al.,</u> S2 10 Cr. 228 (LTS)

Dear Judge Swain:

I write to request that the Court enter the enclosed order exonerating Mrs. Bongiorno's bail and directing that her passport be returned to me. Mrs. Bongiorno surrendered as directed by the Court, and she has begun serving her sentence. The government has already executed Satisfactions of Judgment/Mortgage in connection with the properties posted to secure Mrs. Bongiorno's bail, and Mrs. Bongiorno's suretors have already released the liens placed on their properties to secure her bail. Thus, the only remaining issue relating to Mrs. Bongiorno's bail is the return of her passport. Her husband now resides in Florida near her, so I respectfully request that the passport be returned to me. I will forward it to Mr. Bongiorno after I receive it.

I have not discussed this application with the government, but given the government's willingness to release the liens on the properties posted for bail, I am sure it does not oppose this application.

Respectfully submitted,

Roland G. Riopelle

Enc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	X	
UNITED STATES OF AMERICA	:	10 Cr. 228 (LTS)
-against-	:	ORDER EXONERATING
ANNETTE BONGIORNO,	:	BAIL
Defendant.	:	
	X	
IT IS HEREBY ORDERED, upon the appli	cation of cou	nsel for defendant Annette
Bongiorno, that Mrs. Bongiorno's personal recogni	zance bond is	n this matter is hereby
exonerated and released, and all suretors on Mrs. B	ongiorno's p	ersonal recognizance bond and
all property posted as security for Mrs. Bongiorno's	s personal rec	cognizance bond are also
released from any liability in connection with said	bond.	
IT IS FURTHER ORDERED, that the Pre-	Γrial Services	Agency or any other agency
that has custody of Mrs. Bongiorno's passport return	n it to Mrs. E	Bongiorno's counsel in this
matter, Roland Riopelle.		
	IT IS	S SO ORDERED:

HON. LAURA TAYLOR SWAIN

U. S. D. J.